

ORIGINAL

EX PARTE OR LATE FILED

J. David Liss
Vice President Government Relations
& Strategic Initiatives

Columbia Presbyterian Medical Center
Mailing Address
161 Fort Washington Avenue
New York, NY 10032
TEL 212 305 1190
FAX 212 342 5265
LissDav@nyp.org

November 9, 2000

Ms. Magalie Roman Salas
Secretary, Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED

Nov 20 2000

FCC ROOM

RE: Ultra-Wideband (ET Docket 98-153)

Dear Ms. Salas:

I am writing on behalf of the New York Presbyterian Hospital regarding the FCC's Notice of Proposed Rulemaking concerning Ultra-wideband (UWB) radio transmission. NYPH is a leading health care institution with more than 2,200 beds and 14,000 employees serving approximately 5.5 million patients in the greater New York City Tri-state area. We are currently involved in several efforts that integrate the Internet, traditional telecommunications and Telehealth-related technologies with cutting edge informatics. We believe that advanced computing, combined with advanced telecommunications, will change and improve the practice of medicine.

Increasing the bandwidth available to health care institutions such as ours would be very helpful in bringing the benefits of informatics to patients within and outside our hospital system. High-bandwidth wireless technologies offer the growing Telehealth field the capability of transferring very large data files between users across short distances. Ultra-wideband offers low cost, high speed wireless connectivity for LANs in the critical first or last feet within our facilities. UWB would enable us to avoid costly and disruptive interior wiring projects and allow our clinicians to use a variety of monitors and other devices in a mobile environment, to the extent it is shown through pending FCC / NTIA studies not to interfere with other devices found in our institution.

Increasingly, we are looking for ways to communicate electronic patient medical records -- including high resolution images -- among wireless LAN users within and/or among our facilities and partners to facilitate medical specialty consults, second opinions, the transmission of critical data to and from emergency units, and to provide decision support at the point of care where it is especially vital. You may be aware that NYP's Columbia-Presbyterian Center is considered one of the nation's leaders in the development of the electronic patient record.

No. of Copies rec'd 0
List ABCDE

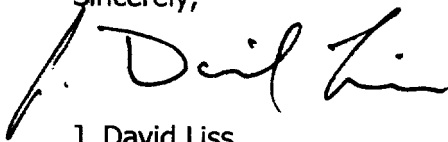
UWB will greatly enhance our ability to develop "e-Health" applications, helping to improve both clinical performance and administrative efficiency -- both of which as you know are high priorities of state and federal health agencies. We believe that through improved charting and by bringing knowledge sources and medical databases via Internet connectivity through wireless LANs to the bedside, we should be able to reduce medical errors—a national issue highlighted in the Institute of Medicine's recent report entitled "To Err is Human: Building a Better Health System." In addition, secure, wireless connectivity to our LAN will also help us ensure safe, reliable, and accurate transmission of patient care records and other sensitive data required by the administrative simplification provisions of the federal Health Insurance and Portability and Accountability Act of 1996 (HIPAA).

This institution was awarded in February the largest civilian telehealth project ever granted by the federal government to intervene in diabetes care for elderly patients in urban and rural sections of New York State. We believe that telehealth holds the key to management of chronically ill patients and that UWB can greatly enhance this service.

In short, we are excited about the prospects for UWB, and would look forward to working to help develop and implement useful clinical and administrative applications for our health care institutions, the millions of patients we serve, and the nation.

We hope that the Federal Communications Commission will favorably view the possibilities of UWB for healthcare in its rule making activities. Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "J. David Liss". The signature is fluid and cursive, with a large initial "J" and "L".

J. David Liss